HONORABLE BARBARA J. ROTHSTEIN 1 2 3 4 5 6 7 UNITED STATES DISTRICT COURT FOR THE WESTERN DISTRICT OF WASHINGTON 8 9 SHANNON SPENCER, individually and on behalf of all others similarly situated, No. 2:23-CV-01723-BJR 10 Plaintiff, 11 STIPULATED MOTION v. FOR EXTENSION OF 12 PROVIDENCE ST. JOSEPH HEALTH TIME AND ORDER 13 FOUNDATION, a Washington nonprofit corporation doing business as PROVIDENCE; 14 and DOES 1-20, 15 Defendants. 16 **STIPULATION** 17 Plaintiff, Shannon Spencer ("Plaintiff"), and Defendant, Providence St. Joseph Health 18 Foundation ("Defendant") (collectively, the "Parties"), by and through their respective 19 undersigned attorneys, respectfully submit this Stipulated Motion for Extension of Time of the 20 following deadlines. 21 Pursuant to Federal Rule of Civil Procedure 6(b), the Parties jointly request as follows: 22 1. For Plaintiff's deadline to bring a Motion to Remand: 23 To extend the deadline for filing a Motion to Remand to July 3, 2024. 24 2. For the FRCP 26(f) conference and initial disclosures: 25 a. To set the FRCP 26(f) conference deadline to July 17, 2024; and 26 K&L GATES LLP STIPULATED MOTION FOR EXTENSION 925 FOURTH AVENUE, SUITE 2900 OF TIME AND ORDER - 1 SEATTLE, WASHINGTON 98104-1158 TELEPHONE: +1 206 623 7580

FACSIMILE: +1 206 623 7022

25

26

b. To set the initial disclosure deadline to July 31, 2024.

To accommodate Defendant's counsel having an unexpected family medical emergency and to provide the Parties with the time needed to prepare for mediation, the Parties have rescheduled their April 17, 2024, mediation to June 19, 2024. This request is made to assist the Parties in facilitating a potential settlement and to provide them with the requisite time to prepare to meet the deadlines if this matter is not resolved during mediation.

DATED May 16, 2024

K&L GATES LLP

By: /s/ Todd L. Nunn
Todd L. Nunn, WSBA # 23267
925 Fourth Avenue, Suite 2900
Seattle, Washington 98104-1158
Tel: +1 206 623 7580
Fax: +1 206 623 7022

Email: todd.nunn@klgates.com

Attorney for Defendant

EMERY REDDY PLLC

By: s/ Timothy W. Emery
Timothy W. Emery, WSBA #34078
Patrick B. Reddy, WSBA #34092
Paul Cipriani, WSBA #59991
600 Stewart Street, Suite 1100
Seattle, WA 98101
Phone: 206-442-9106

Email: emeryt@emeryreddy.com reddyp@emeryreddy.com paul@emeryreddy.com

Attorneys for Plaintiff

ORDER

Upon consideration of the Parties' Stipulated Motion for Extension, the Court finds that good cause exists to extend certain deadlines, and it is hereby **ORDERED** that the Motion is **GRANTED**.

It is **FURTHER ORDERED** that filing deadlines will be modified as follows.

Event	Current Date	New Date
Motion to Remand	May 1, 2024	July 3, 2024
FRCP 26(f) Conference	May 15, 2024	July 17, 2024
Initial Disclosure Deadline	May 22, 2024	July 31, 2024
Joint Status Report	May 29, 2024	August 7, 2024

DATED this 16th day of May 2023.

HONORABLE BARBARA J. ROTHSTEIN